

KARL F. DEAN
MAYOR

TNG 110000
PTH

METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY



DEPARTMENT OF WATER AND SEWERAGE SERVICES
STORMWATER DIVISION
NPDES OFFICE
1607 COUNTY HOSPITAL ROAD
NASHVILLE, TENNESSEE 37218

October 26, 2012

Tennessee Department of Environment and Conservation
Division of Water Resources
401 Church Street
L&C Annex, Sixth Floor
Nashville, Tennessee 37243-1534

RE: **NPDES Permit No: TNG110000**
Ready Mixed Concrete Facilities
Comments on Draft Permit

RECEIVED

OCT 26 2012

TN Division of Water
Pollution Control

Dear Division of Water Resources:

We would like to thank you for the opportunity to provide comments on the new draft version of the Ready Mixed Concrete General Permit (TNG110000) to allow the discharge of stormwater and process water to Waters of the State. Our comments represent the Metro Nashville and Davidson County (Metro) Municipal Separate Storm Sewer System (MS4) Program's perspective based on our experiences inspecting ready mixed concrete facilities within Metro. The Metro Water Services (MWS) Stormwater NPDES Section has performed numerous inspections of ready mixed concrete plants and has found a common compliance issue that could be perceived as affecting Metro's ability to maintain compliance with its MS4 permit.

The Ready Mixed Concrete Permit generally requires concrete mixing facilities to control pollutants discharging from their site via stormwater runoff and process water discharges. While Metro understands the need for the permit to be vague as it relates to mentioning specific types of controls to be implemented, we would request the permit be more detailed on minimizing the migration of pollutants to the MS4/street/right of way. Specifically, Metro requests language be added to section 7.2 (Minimum Elements and Activities of SWPPP) that addresses the tracking out of aggregate material into public streets.

Over the years, Metro has responded to numerous citizen complaints about concrete mixing facilities tracking out sand, gravel dust, and other aggregate material into public streets. In many instances, the material has been found to clog street inlets and increase concentrations of total suspended solids (TSS) within MS4 runoff. Through coordination with TDEC field office staff and the concrete facilities, a common response or best management practice (BMP) always seems to emerge - street sweeping is usually deployed as the primary BMP for many concrete mixing facilities. While routinely sweeping streets does help to minimize impacts to the MS4 to some degree, it has not been proven to be reliable for the following reasons:



1. Often times, the streets are not swept just prior to a rain event; and
2. The sweeping activities, due to the variable effectiveness of street sweeping equipment, do not collect all of the material and pushes certain finer particles into roadway cracks/pores. During subsequent rain events, some of this material becomes dislodged and is taken up by runoff.

Based on the aforementioned considerations, it is Metro's position that such facilities' street sweeping should only be considered a remediation activity and facilities with tracking issues should be required to implement primary, on-site BMP controls to prevent the tracking of materials from their property/into public right of ways – especially if such material will eventually route to MS4.

We appreciate the opportunity to comment on this draft permit. If you should have any questions regarding these comment, please feel free to contact me at 615-880-2420.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Hunt", with a stylized flourish at the end.

Michael Hunt
MWS Stormwater NPDES Program